IOWA DEPARTMENT OF NATURAL RESOURCES
AIR QUALITY BUREAU

Notification of Compliance Status

Plating and Polishing Area Source Rule
40 CFR 63 Subpart WWWWWW

Section 1 – Facility Information

☐ Yes, this facility is subject to 40 CFR Part 63 subpart WWWWWW, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations

Compliance Date:

☐ Facility is a new source (Initial startup was after March 14, 2008) Startup Date _____
The compliance date for new sources is July 1, 2008, or upon startup, whichever is later.

☐ Facility is an existing source (Initial startup was on or before March 14, 2008) Startup Date _____
The compliance date for existing sources is July 1, 2010.

Company Name:	Facility Name (if different):		
Facility Street Address:	City:	State:	Zip:
Owner/Operator Name and Title:	Phone number:	Email (if available):	
Mailing Address (if different from facility street address):	City:	State:	Zip:

Subpart WWWWWW applies to facilities engaged in the following types of processes that emit or use materials that contain any of the plating and polishing metal HAP (cadmium, chromium, lead, manganese, or nickel):

- Electroplating
- Electroless or non-electrolytic coating
- Other non-electrolytic metal coating, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating, and thermal spraying
- Dry mechanical polishing after plating
- Electroforming
- Eletropolishing

Subpart WWWWWW does not apply to chromium electroplating and chromium anodizing sources, as those sources are subject to 40 CFR part 63, subpart N, ‘‘Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks.

There are several fact sheets on this rule available on DNR’s web site at http://www.iowadnr.gov/air/prof/NESHAP/
The full text of the rule is available at http://www.epa.gov/ttn/atw/area/fr01jy08.pdf

Section 2 – Identification of Affected Operations

The following are the operations at this facility subject to subpart WWWWWW (check all that apply):[a]

Tank Processes

- Electroplating (noncyanide) ☐
- Continuous electroplating (noncyanide) ☐
- Short-term electroplating (noncyanide) ☐
- Electropolishing ☐
- Electroforming ☐
- Electroplating (cyanide) ☐
- Electroless nickel ☐
- Chrome conversion coating ☐
- Other electroless plating/coating/dipping ☐

Thermal Spraying and Dry Mechanical Polishing Processes

- Thermal spraying (permanent line) ☐
- Thermal spraying (temporary, in-situ) ☐
- Dry mechanical polishing ☐

[a] **Important Note:** These operations are affected sources under subpart WWWWWW **only if** they use materials that contain or have the potential to emit *Plating and Polishing metal HAP*.

Plating and polishing metal HAP means any compound of any of the following metals: cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form, with the exception of lead.

Section 3 – Compliance Methods

The following table lists the compliance methods used for each affected tank process at this facility, identified on page 2:

Table 1

Tank Process Description/ID No.	HAP Emitted or Used	Compliance Method(s) (Check all that apply)
________________	☐ Cadmium ☐ Chromium ☐ Lead ☐ Manganese ☐ Nickel	☐ Wetting agent/fume suppressant ☐ Vented to a control device; describe: ____________________ ☐ Tank cover ☐ Time limit (short-term plating only) ☐ Management practices
________________	☐ Cadmium ☐ Chromium ☐ Lead ☐ Manganese ☐ Nickel	☐ Wetting agent/fume suppressant ☐ Vented to a control device; describe: ____________________ ☐ Tank cover ☐ Time limit (short-term plating only) ☐ Management practices
________________	☐ Cadmium ☐ Chromium ☐ Lead ☐ Manganese ☐ Nickel	☐ Wetting agent/fume suppressant ☐ Vented to a control device; describe: ____________________ ☐ Tank cover ☐ Time limit (short-term plating only) ☐ Management practices
________________	☐ Cadmium ☐ Chromium ☐ Lead ☐ Manganese ☐ Nickel	☐ Wetting agent/fume suppressant ☐ Vented to a control device; describe: ____________________ ☐ Tank cover ☐ Time limit (short-term plating only) ☐ Management practices
________________	☐ Cadmium ☐ Chromium ☐ Lead ☐ Manganese ☐ Nickel	☐ Wetting agent/fume suppressant ☐ Vented to a control device; describe: ____________________ ☐ Tank cover ☐ Time limit (short-term plating only) ☐ Management practices
________________	☐ Cadmium ☐ Chromium ☐ Lead ☐ Manganese ☐ Nickel	☐ Wetting agent/fume suppressant ☐ Vented to a control device; describe: ____________________ ☐ Tank cover ☐ Time limit (short-term plating only) ☐ Management practices

Table 1 (continued)

Tank Process Description/ID No.	HAP Emitted or Used	Compliance Method(s) (Check all that apply)
__________________	☐ Cadmium ☐ Chromium ☐ Lead ☐ Manganese ☐ Nickel	☐ Wetting agent/fume suppressant ☐ Vented to a control device; describe: ______________________ ☐ Tank cover ☐ Time limit (short-term plating only) ☐ Management practices
__________________	☐ Cadmium ☐ Chromium ☐ Lead ☐ Manganese ☐ Nickel	☐ Wetting agent/fume suppressant ☐ Vented to a control device; describe: ______________________ ☐ Tank cover ☐ Time limit (short-term plating only) ☐ Management practices
__________________	☐ Cadmium ☐ Chromium ☐ Lead ☐ Manganese ☐ Nickel	☐ Wetting agent/fume suppressant ☐ Vented to a control device; describe: ______________________ ☐ Tank cover ☐ Time limit (short-term plating only) ☐ Management practices
__________________	☐ Cadmium ☐ Chromium ☐ Lead ☐ Manganese ☐ Nickel	☐ Wetting agent/fume suppressant ☐ Vented to a control device; describe: ______________________ ☐ Tank cover ☐ Time limit (short-term plating only) ☐ Management practices
__________________	☐ Cadmium ☐ Chromium ☐ Lead ☐ Manganese ☐ Nickel	☐ Wetting agent/fume suppressant ☐ Vented to a control device; describe: ______________________ ☐ Tank cover ☐ Time limit (short-term plating only) ☐ Management practices
__________________	☐ Cadmium ☐ Chromium ☐ Lead ☐ Manganese ☐ Nickel	☐ Wetting agent/fume suppressant ☐ Vented to a control device; describe: ______________________ ☐ Tank cover ☐ Time limit (short-term plating only) ☐ Management practices
__________________	☐ Cadmium ☐ Chromium ☐ Lead ☐ Manganese ☐ Nickel	☐ Wetting agent/fume suppressant ☐ Vented to a control device; describe: ______________________ ☐ Tank cover ☐ Time limit (short-term plating only) ☐ Management practices

The following table lists the compliance methods used for each affected thermal spraying booth/line (temporary and permanent), and dry mechanical polishing process at this facility, identified on page 2:

Table 2

Thermal Spray Booth/Line or Dry Mechanical Polishing Description/ID No.	HAP Emitted or Used	Compliance Method(s) (Check all that apply)
______________________	☐ Cadmium ☐ Chromium ☐ Lead ☐ Manganese ☐ Nickel	☐ Vented to a control device; describe: ________________________ ☐ Management practices (temporary thermal spraying only)
______________________	☐ Cadmium ☐ Chromium ☐ Lead ☐ Manganese ☐ Nickel	☐ Vented to a control device; describe: ________________________ ☐ Management practices (temporary thermal spraying only)
______________________	☐ Cadmium ☐ Chromium ☐ Lead ☐ Manganese ☐ Nickel	☐ Vented to a control device; describe: ________________________ ☐ Management practices (temporary thermal spraying only)
______________________	☐ Cadmium ☐ Chromium ☐ Lead ☐ Manganese ☐ Nickel	☐ Vented to a control device; describe: ________________________ ☐ Management practices (temporary thermal spraying only)
______________________	☐ Cadmium ☐ Chromium ☐ Lead ☐ Manganese ☐ Nickel	☐ Vented to a control device; describe: ________________________ ☐ Management practices (temporary thermal spraying only)
______________________	☐ Cadmium ☐ Chromium ☐ Lead ☐ Manganese ☐ Nickel	☐ Vented to a control device; describe: ________________________ ☐ Management practices (temporary thermal spraying only)
______________________	☐ Cadmium ☐ Chromium ☐ Lead ☐ Manganese ☐ Nickel	☐ Vented to a control device; describe: ________________________ ☐ Management practices (temporary thermal spraying only)
______________________	☐ Cadmium ☐ Chromium ☐ Lead ☐ Manganese ☐ Nickel	☐ Vented to a control device; describe: ________________________ ☐ Management practices (temporary thermal spraying only)

Section 4 – Management Practices

The following applicable management practices are used at this facility, as practicable:

- ☐ Minimize bath agitation when removing any parts processed in the tank, except when necessary to meet part quality requirements, as practicable.
- ☐ Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable.
- ☐ Optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank), as practicable.
- ☐ Use tank covers, if already owned and available at the facility, whenever practicable.
- ☐ Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).
- ☐ Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable.
- ☐ Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre treated parts to be plated, as practicable.
- ☐ Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable.
- ☐ Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable.
- ☐ Minimize spills and overflow of tanks, as practicable.
- ☐ Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable.
- ☐ Perform regular inspections to identify leaks and other opportunities for pollution prevention.

Section 5 – Compliance Status

☐ Yes, this facility is operating in compliance with all of the relevant standards and other requirements of 40 CFR Part 63 subpart WWWWWW, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations

☐ No, this facility is not operating in compliance with all of the relevant standards and other requirements of 40 CFR Part 63 subpart WWWWWW, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations

Reason for noncompliance:

_____

_____

_____

_____

_____

Section 6 – Signature

Responsible Official Certification		
☐ **I certify the truth, accuracy, and completeness of this notification.**		
Responsible Official Name	Responsible Official Signature	Date

Section 7 – Addresses

Submit the Initial Notification to:

Submit this notification to the following agency(ies):

- Iowa Department of Natural Resources, NESHAP Coordinator, 7900 Hickman, Suite 1; Windsor Heights, IA, 50324
- If the facility is located in either Linn County or Polk County, this notification shall also be submitted to the appropriate county office:

Polk County Public Works
Air Quality Division
5885 NE 14th Street
Des Moines, IA 50313

Linn County Public Health
Air Quality Division
501 13th Street NW
Cedar Rapids, IA 52405